

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

TYRONE WHITE,)	
)	
Plaintiff,)	
)	Case No. 1:11-CV-6185
vs.)	
)	Jury Demand Requested
)	
JERRY WILSON,)	
)	
Defendant.)	

FIRST AMENDED COMPLAINT

NOW COMES, Plaintiff, TYRONE WHITE, by and through his attorney Yao O. Dinizulu of Dinizulu Law Group, Ltd., hereby complain against Defendant, JERRY WILSON, as follows:

GENERAL ALLEGATIONS

1. The Plaintiff, TYRONE WHITE, during all relevant times was a citizen of the city of Chicago, County of Cook, State of Illinois.
2. That the Defendant, JERRY WILSON, during all relevant times was a citizen of the city of Gary, State of Indiana.
3. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1332.

COUNT I - NEGLIGENCE

4. Plaintiff realleges paragraphs 1-3 of this Complaint as set forth above, as fully set forth herein.
5. On or about September 10, 2009, Plaintiff Tyrone White was in his vehicle stopped in traffic.
6. The vehicle driven by Defendant, Jerry Wilson slammed into the rear of the Plaintiff's vehicle violently throwing him around the interior of his car.
7. The vehicle driven by Defendant, Jerry Wilson bears Indiana license plate number 907181.
8. As a result of the accident, Plaintiff Tyrone White had to seek medical treatment.
9. The Defendant Jerry Wilson had a duty to do the following:

- a. To make proper observations;
 - b. To exercise due care and caution;
 - c. To have his vehicle under control.
10. The Defendant breached the duty of care by the following:
 - a. Failing to make proper observations and rear ending the Plaintiff;
 - b. Failing to exercise due care and caution by traveling too close to the Plaintiff;
 - c. Failing to have his vehicle under control and allowing it to collide with the Plaintiff's vehicle.
11. That the Defendant's act was the cause in fact and the proximate cause of Plaintiff's injuries.
12. That as a direct and proximate result of Defendant's act, Plaintiff has sustained numerous injuries.
13. Plaintiff has also incurred excessive and expensive medical bills associated with the Defendant's act; and his suffering includes but is not limited to:
 - a. Pain, suffering, humiliation, anxiety, embarrassment, past and future, permanent injuries and anatomical changes, denial of everyday social pleasures and other noneconomic loss and damage.
 - b. Loss of earning capacity.

WHEREFORE, Plaintiff TYRONE WHITE, requests Judgment against Defendant JERRY WILSON in excess of the jurisdictional amount of this courts and all other all other compensation this Court deems appropriate.

Respectfully submitted,

DINIZULU LAW GROUP, LTD.

s/ Yao O. Dinizulu
Yao O. Dinizulu
Attorney for Plaintiff, Tyrone White

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